

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOEL HODGELL,

Plaintiff,

v.

ANDERSEN CORPORATION, a foreign  
corporation; and RENEWAL BY  
ANDERSEN, LLC, a limited liability  
corporation,

Defendants.

No.

DECLARATION OF WILLIAM N. BARRON  
IN SUPPORT OF DEFENDANTS' NOTICE  
OF REMOVAL

I, William N. Barron, declare and state under penalty of perjury as follows:

1. My name is William N. Barron. I am over the age of 18 and am competent to make this declaration.

2. This declaration is based on my personal knowledge and review of documents that Andersen Corporation and Renewal by Andersen LLC (collectively, "Andersen") maintain in the ordinary course of business and were made at or about the time of the events described herein. If called and sworn as a witness, I could and would competently testify to the matters discussed in this declaration.

3. I am Assistant General Counsel of Litigation and Intellectual Property for Andersen

1 Corporation, and in that capacity, I have regular access to, and am familiar with, Andersen  
2 Corporation's and Renewal by Andersen LLC's records maintained in the ordinary course of  
3 business relating to their business structures and ownership. I have personal knowledge from my  
4 own experience and review of these records.

5 4. Andersen Corporation is a Minnesota corporation with its principal place of  
6 business in Bayport, Minnesota.

7 5. Renewal by Andersen LLC is a Minnesota limited liability company with a single  
8 member, SLBP Holdings Corporation. SLBP Holdings Corporation is a Minnesota corporation  
9 with its principal place of business in Bayport, Minnesota.

10 I declare under penalty of perjury under the laws of the State of Minnesota and the  
11 United States of America that the foregoing is true and correct.

12 Executed this 3rd day of May, 2023, at Minneapolis, Minnesota.

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15 WILLIAM N. BARRON  
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